

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROWENA WAGNER,)	Civil Action No. 04-264 ERIE
)	Judge Sean J. McLaughlin
Plaintiff)	
)	
v.)	ELECTRONICALLY FILED
)	
CRAWFORD CENTRAL SCHOOL)	
DISTRICT, et al.)	
)	
Defendants)	

**JOINT MOTION TO EXTEND DEADLINES
FOR FILING DISPOSITIVE MOTIONS**

AND NOW, this 6th day of June, 2006, Defendants, Crawford Central School District, Crawford Central School Board, Michael E. Dolecki, Superintendent, and Charles E. Heller, III, Assistant Superintendent, ("Defendants"), by and through their counsel, Knox McLaughlin Gornall & Sennett, P.C., and Plaintiff, Rowena Wagner, by and through her attorneys, Edith Benson, Esq. and Caleb Nichols, Esq., move to extend the deadlines for the filing of dispositive motions in the present matter. In support of their Motion, the parties state the following:

1. On May 23, 2006, Defendants filed a motion requesting an extension of the deadline for filing dispositive motions until after mediation efforts with Magistrate Judge Susan Paradise Baxter were concluded.
2. Most of Defendants' preparation of their Motion for Summary Judgment was deferred pending the outcome of mediation.
3. The current filing deadline of June 12, 2006 for Defendants' Motion for Summary Judgment conflicts with end of school year activities.
4. Plaintiff's attorney, Edith Benson, was advised recently of a death in Attorney Benson's family and she will be departing out of state within the next day or two.

5. The parties respectfully request that the Court extend Defendants' deadline for filing their Motion for Summary Judgment to June 26, 2006, with Plaintiff's reply to be filed on or before July 14, 2006.

WHEREFORE, Defendants, Crawford Central School District, Crawford Central School Board, Michael E. Dolecki, Superintendent, and Charles E. Heller, III, Assistant Superintendent, and Plaintiff, Rowena Wagner, respectfully request that the Court grant their Joint Motion to Extend Deadlines for Filing Dispositive Motions and extend Defendants' deadline for filing their Motion for Summary Judgment to June 26, 2006, with Plaintiff's reply to be filed on or before July 14, 2006.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.

Respectfully submitted,

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